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Las Vegas Metropolitan Police
6 Department, Corrections Officer
Angelo Larry and Corrections Officer
7 Rolando Trevino

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA, SOUTHERN DIVISION

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11 PATRICIA FITZPATRICK and ROBERT L.
ANSARA, as Special Co-Administrators and
12 Special Representatives of the Estate of
JEREMIAH BOWLING, deceased; and
13 PATRICIA FITZPATRICK, as Heir and
Mother of JEREMIAH BOWLING, deceased,

14 Plaintiff,

15 vs.
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17 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
18 State of Nevada; ANGELO LARRY,
Corrections Officer, individually and in his
19 official capacity; ROLANDO TREVINO,
Corrections Officer, individually and in his
20 official capacity; DOES 1 through 10,
individually and/or in their official capacities;
21 DOE CLASSIFICATION OFFICERS I
through 10, individually and/or in their official
22 capacities; DOE CORRECTIONS OFFICERS
I through 10, individually and/or in their
23 official capacities; ROE CORPORATIONS I
through 10, Foreign and/or Domestic
24 Corporations, NAPHCARE, INC., an Alabama
corporation qualified to do business in the
25 State of Nevada; DOE HEALTH CARE
PROVIDERS1 through 10, individually,

26 Defendants.
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CASE NO. 2:17-cv-1886-JAD-PAL

**STIPULATION AND ORDER
EXTENDING THE DEADLINE FOR THE
FILING OF DEFENDANTS LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT, CORRECTIONS
OFFICER ANGELO LARRY AND
CORRECTIONS OFFICER ROLANDO
TREVINO ANSWER TO PLAINTIFFS'
SECOND AMENDED COMPLAINT**

**STIPULATION AND ORDER EXTENDING THE DEADLINE
FOR THE FILING OF DEFENDANTS LAS VEGAS METROPOLITAN
POLICE DEPARTMENT, CORRECTIONS OFFICER ANGELO LARRY
AND CORRECTIONS OFFICER ROLANDO TREVINO'S
ANSWER TO PLAINTIFFS' SECOND AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between Robert W. Freeman, Esq. of LEWIS BRISBOIS BISGAARD & SMITH LLP, counsel for Defendants Las Vegas Metropolitan Police Department, Corrections Officer Angelo Larry and Corrections Officer Rolando Trevino and Nadine M. Morton, Esq., of MORTON LAW, PLLC, counsel for Plaintiffs Patricia Fitzpatrick and Robert L. Ansara, as Special Co-Administrators and Special Representatives of the Estate of Jeremiah Bowling, deceased; and Patricia Fitzpatrick, as Heir and Mother of Jeremiah Bowling, that:

The due date for Defendants' Answer to Plaintiffs' Second Amended Complaint (ECF No. 32), be extended from March 12, 2018, to March 19, 2018.

Reason for the Extension:

Because of the complexity of the claims made in Plaintiffs' Amended Complaint, Defendants need additional time to perform an investigation prior to filing a responsive pleading.

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1 This is the first request to extend this deadline, which is made in good faith and not for purposes
2 of delay.

3 DATED this 12th day of March, 2018.

DATED this 12th day of March 2018.

4 MORTON LAW, PLLC

LEWIS BRISBOIS BISGAARD & SMITH

5
6 /s/ Nadine M. Morton

Nadine M. Morton, Esq.

7 Nevada Bar No. 8583

8 11700 West Charleston Blvd.

9 Suite 170-65

Las Vegas, Nevada 89135

Attorney for Plaintiffs

/s/ Robert W. Freeman

Robert W. Freeman, Jr., Esq.

Nevada Bar No. 3062

6385 S. Rainbow Blvd., Suite 600

Las Vegas, Nevada 89118

Attorneys for Defendants

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12 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

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DATED: March 13, 2018

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